

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

KOLBY DUCKETT,	*
DAVID SCHILLING, and	*
DAVID HOLLOWAY,	*
Plaintiffs,	*
v.	*
CHIEF BRIAN HICKMAN, individually, and in his official capacity as the Police Chief of the City of Collegedale,	Docket No. 1:19-cv-00295
TED ROGERS, individually, and in his official capacity as the City Manager of the City of Collegedale, and	*
THE CITY OF COLLEGEDALE, TENNESSEE, a municipality.	JURY DEMAND
Defendants.	*

PLAINTIFFS' NOTICE OF DEPOSITION

To: Michelle Toro, Assistant City Manager
c/o ROBINSON, SMITH & WELLS, PLLC
Suite 700, Republic Centre
633 Chestnut Street
Chattanooga, TN 37450

COMES NOW, the Plaintiffs, Kolby Duckett (Officer Duckett), David Schilling (Officer Schilling), and David Holloway (Corporal Holloway) by and through their counsel, Davis & Hoss, P.C. pursuant to Rule 26 of the *Federal Rules of Civil Procedure*, shall take the deposition of Michelle Toro on May 6, 2021 at 9:30 a.m. EST, at the Liberty Tower, located at 605 Chestnut

Street, Chattanooga, TN 37450. The deposition shall be recorded by stenographic means before a notary public, an official court reporter, or other person authorized by law to administer an oath and shall continue from day to day until completed.

Respectfully submitted,

DAVIS & HOSS, P.C.

\s\ Janie Parks Varnell

Janie Parks Varnell, BPR #031256

Bryan H. Hoss, BPR #021529

Attorneys for the Plaintiffs

850 Fort Wood Street

Chattanooga, TN 37403

(423) 266-0605

(423) 266-0687 – Fax

janie@davis-hoss.com

bryan@davis-hoss.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U. S. mail. Parties may access this filing through the Court's electronic filing system.

Benjamin K. Lauderback

Brian Bibb

WATSON, ROACH, BATSON, & LAUDERBACK

900 S. Gay Street, Suite 1500

P.O. Box 131

Knoxville, TN 37901-0131

Attorneys for Chief Brian Hickman

Keith H. Grant

Philip Aaron Wells

ROBINSON, SMITH & WELLS, PLLC

Suite 700, Republic Centre

633 Chestnut Street

Chattanooga, TN 37450

Attorneys for City of Collegedale

and City Manager Ted Rogers

Dated this the 13th day of April, 2021.

/s/ Janie Parks Varnell
JANIE PARKS VARNELL